

United States Bankruptcy Court
Northern District of Illinois, Eastern Division

IN RE: Asia Campbell-Branch)	Chapter 13
)	Case No. 19 B 02773
Debtor(s))	Judge Timothy A Barnes

Notice of Motion

Asia Campbell-Branch
14840 Avalon Ave
Dolton, IL 60419

Debtor Attorney: David M Siegel
via Clerk's ECF noticing procedures

On May 02, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 744
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, April 25, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 02/01/2019.
2. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
3. The debtor(s) have failed to address the proof of claim filed by the Internal Revenue Service regarding unfiled tax returns for tax year(s) 2018.
4. The debtor(s) have failed to maintain payments to the Trustee's office as required under 11 U.S.C. §1326.
5. The debtor(s) have failed to resolve the pending objection(s) to the plan.
6. The debtor failed to amend schedule I to correct the amount from Social Security and remove income from debtor's second job.
7. There is not enough income available in order to fund the Chapter 13 plan.
8. The debtor failed to amend schedule J to correct household size and correctly list the ages of everyone living in the household.
9. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE